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METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

Office of the General Manager

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CALFED Bay-Delta Program

Via Facsimile and U.S. Mail

August 21, 2000

Mr. Steven R. Ritchie
Acting Executive Director
CALFED Bay-Delta Program
1416 Ninth Street, Suite 1155
Sacramento, CA 95814

Dear Mr. Ritchie:

Comments on the Final Programmatic EIS/EIR

The Metropolitan Water District of Southern California (Metropolitan) has long urged CALFED to commit to a specific plan of action that provides near-term benefits to both water users and the environment. In June of this year, Governor Gray Davis and Secretary of the Interior Bruce Babbitt announced that a specific set of actions for the CALFED program had finally been proposed. The June 9 document "California's Water Future: A Framework for Action" (Framework Agreement) combines a specific set of actions for Stage 1 of the Bay-Delta Program with a strategy for implementation to create a balanced, near-term solution.

The Framework Agreement is consistent with most, but not all, of Metropolitan's goals for the Bay-Delta Program and responds to many of Metropolitan's comments on CALFED's 1999 Draft EIS/EIR. We believe that the set of the actions and implementation strategy outlined in the Framework agreement are consistent with the original objectives of the Bay-Delta Program. Overall, the Framework agreement appears to provide a workable solution to long-standing Bay-Delta issues and represents a step in the right direction that Metropolitan can support. We note that the Framework agreement actions are nothing new. These are actions that have been adequately evaluated at the program level through years of study and analyses conducted by CALFED in preparation of Programmatic EIS/EIR. We believe CALFED's environmental analyses fully support moving forward with implementation of the Framework Agreement.

On July 21, 2000, CALFED released its Final PEIS/EIR for the Bay-Delta Program. Given the sheer volume of the Final PEIS/EIR document and the limited amount of time available for review¹, Metropolitan has not been able to complete a thorough evaluation of CALFED's

¹ It is noted that the Final FEIS/EIR, consisting of approximately 9600 pages in 19 separately bound volumes, was available only through CALFED's web site immediately after the release date of July 21, 2000. Sections of the FEIS/EIR, most notably the comment letters, were not available through the web site. A print version of the FEIS/EIR was not mailed to Metropolitan until July 31, 2000, which was received on August 2, 2000.

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responses to our September 23, 1999 letter on the Draft PEIS/EIR. Consequently, all of our previous comments on the Draft EIS/EIR stand.

Metropolitan notes one response in particular, however, that is in error. In "Common Response 17: Growth/Planning Issues" (Page CR-17) and in the body of the text in the Impact Analysis Volume of the Final PEIS/EIR (Page 4-7), the Final PEIS/EIR presumes "any increase in water supply or water supply reliability was assumed to be growth inducing." Given that the Program actions will not provide any increase in total water supplies, but will only replace some water lost to prior environmental actions, there can be no basis for this erroneous assumption. Furthermore, even if the Program provided an increase in water supplies, a direct correlation between increased supplies and growth would need to be shown to conclude growth inducing effects.

Metropolitan understands that approval of the Program by the State CALFED agencies has not been scheduled. The July 21, 2000 letter transmitting the Final PEIS/EIR, attached, signed on behalf of the State by Mary Nichols, discusses only completion of a Record of Decision, which applies only to the Federal CALFED Agencies. As stated in our September 23, 1999 letter on the Draft PEIS/EIR, we support the approach of not carrying the PEIS/EIR to an approved final, but instead embarking on implementation through independent, project-level environmental documentation. If, however, the State CALFED agencies decide to approve the Program, Metropolitan hereby requests to be notified in advance of the date and time of such action.

Very truly yours,



Timothy H. Quinn

Deputy General Manager

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Enclosure